6 PERSONAL FINANCIAL MANAGEMENT

Program Management / Administration

6.1 QUALITY ASSURANCE

Quality can be considered a degree of excellence, the extent to which something fulfills its purpose. Quality is a result of a comparison between what is required and what is provided. Several methods have emerged to achieve, support and improve quality. Known as quality management these methods include quality control (QC), continuous quality improvement (CQI) and quality assurance (QA). Whichever term is applied, the organization and all staff members must make a commitment to quality.

6.1.1 PURPOSE OF QUALITY ASSURANCE

The purpose of quality assurance for PFM programs and services is to achieve and maintain excellence in all areas. To do so requires the following:

• Clearly identify programs/services.

• Determine whether stated program goals have been met.

• Plan improvements in service delivery: How can things be done better?

• Provide data to justify the programs/services.

A variety of methodologies and tools have been developed to achieve quality. These include:

• Management systems: Quality management establishes a unity of purpose and direction

enabling the organization to meet the needs of its customers reliably, repeatedly and economically.

- Philosophies: Total Quality Management (TQM), Continuous Quality Improvement (CQI) and other methods are ways of thinking about goals, processes and people to ensure quality.

- Tools and Techniques: Flowcharts, statistics, standards and benchmarks, etc. are used to measure and achieve quality.

6.1.2 FFSC ACCREDITATION STANDARDS

The Navy has established its own QA measures. The Navy Personnel Command (PERS-66) established accreditation Quality Standards in 1997 and amended them in 2000. The FFSC Accreditation Standards were implemented to ensure quality service delivery. Section 59000 of the FFSC Accreditation Standards addresses PFM.

Quality standards help focus the PFM program requirements so that tasks can be prioritized and completed. The quality of work and of the program are weighed against various quality standards. The Navy's accreditation standards can also be used as a benchmark against which to measure the financial educator's performance and how well the program is administered.

The Navy's FFSC Accreditation Standards were developed for all FFSCs to ensure customers receive quality services. An accreditation team visits each FFSC for scheduled program reviews. The program review is a formal assessment to see that programs are meeting the accreditation standards.

In a program review, the evaluation teams check to see that the accreditation standards are being met; both those that apply to the FFSC as a whole, and those specific to individual programs. The evaluation teams look for key indicators to determine whether the FFSC is complying with the standards.

The accreditation standards and key indicators that most directly affect PFM are found in Section 59000: Personal Financial Management (PFM) Education, Training, and Counseling Program. The following chart contains the PFM Accreditation Standards.

59000: PERSONAL FINANCIAL MANAGEMENT (PFM) EDUCATION, TRAINING AND COUNSELING PROGRAM

ACCREDITATION STANDARD 59010:

FFSC provides financial education counseling and/or referrals. The FFSC will have as a minimum, one staff member trained as a Financial Educator (FE). FFSC staff refers to Command Financial Specialists (CFSs) and are available for referrals from CFSs. Personal finance and consumer education materials are accessible on-site.

KEY INDICATORS:

- Case records and interviews with FFSC staff members indicate financial case management and reporting methods comply with the Privacy Act and FFSC counseling guidelines and reporting requirements.

- Personnel records indicate that at least one staff member is designated as a FE and has attended the CFS training course (CIN S-541-0002).

KEY INDICATORS:

- Consumer education materials and local community resources are made available to FFSC clients.

- FFSC educators/counselors have information on latest pay advisories affecting military pay and allowances and relocation/travel entitlements under permanent change in station (PCS) orders.

ACCREDITATION STANDARD 59020:

FFSC staff is familiar with personal financial and consumer resources within the local community. FFSC makes appropriate referrals to these agencies and coordinate services to the fullest extent.

KEY INDICATOR:

- Training/program schedules indicate PFM training programs are provided and needs assessment data is used to guide program development and scheduling.

ACCREDITATION STANDARD 59030:

Financial education and training programs are provided in accordance with formal and/or ongoing needs assessment. Examples of financial education programs are:
- Personal and Family Budgeting
- Consumer Rip-offs in the market place
- Check Writing/Account Maintenance/ATMs
- Car Buying Strategies

ACCREDITATION STANDARD 59040:

Assessments are conducted with all PFM clients to provide a detailed review of the clients' monthly income, living expenses, and the nature of all debts to identify either a surplus or deficit situation. Counselors assist clients in developing a financial plan by presenting available alternatives.

KEY INDICATOR:

- Written guidance requires financial assessments for all PFM clients. Review of records confirms that financial assessments are completed.

ACCREDITATION STANDARD 59050:

When, after a full assessment and consideration of the alternatives, the option of bankruptcy seems the only alternative, the agency refers the client to appropriate legal assistance agencies.

KEY INDICATOR:

- Counseling records show evidence of timely referrals.

ACCREDITATION STANDARD 59060:
(Critical Standard)

Volunteers do not provide service for persons indebted to a company with which the volunteer is associated.

KEY INDICATOR:

- Volunteer training includes a requirement for volunteers so associated to remove themselves from particular cases where a conflict of interest has arisen.
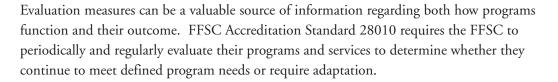

ACCREDITATION STANDARD 59070:

If designated as a CFS training site by PERS-66, FFSC provides the Navy's 5-day CFS training course. Training is in accordance with OPNAVINST 1740.5A and utilizes both internal and external presenters. Presentations by external presenters must have prior PERS-66 approval.

KEY INDICATORS:

- Lesson plans and training comply with OPNAVINST 1740.5A.

- Records, observation of training, and interviews with FFSC staff members indicate training is planned, executed and evaluated per FFSC Education and Training Standards.

6.1.3 Program Evaluation

Evaluation measures can be a valuable source of information regarding both how programs function and their outcome. FFSC Accreditation Standard 28010 requires the FFSC to periodically and regularly evaluate their programs and services to determine whether they continue to meet defined program needs or require adaptation.

6.1.3.1 Purpose of Program Evaluation

The purpose of evaluating PFM programs is to determine whether:

- The program content is effective and the objectives are being met.

- The material is clearly and interestingly presented.

- The programs are efficient, i.e. cost-effective.

- The services provided are in accordance with applicable Navy directives.

- Factors exist that either facilitate or impede the program.

Information provided by program evaluations can be used to:

- Determine if the participants enhanced their knowledge or learned new skills.

- Determine if changes to the program content or the presentation format should be made.

- Provide objective feedback to managers and policy makers.

- Provide information and feedback to commands on the needs of their members.

- Update SOPs, materials and handouts.

6.1.3.2 Evaluation Measures

The measures used to evaluate the program are derived from PFM goals and objectives established through needs assessments and program. The following characteristics must be considered when developing evaluation measures. Evaluation measures should be:

- **Objective:** Data sources should include recipients and observers of programs/services as well as program staff.

- **Feasible:** It must be possible to acquire meaningful data called for by the measure.

- **Measurable:** It should be possible to determine both a qualitative and quantitative value for the measure.

- **Relevant to program goals:** Demonstrate the extent to which the program is responding to the need.

- **Relevant to the Navy's mission:** Demonstrate how the program contributes to readiness and retention.

- **Relevant to the command:** Provide the command with useful information.

- **Cost-effective:** It should be possible to collect data at a reasonable cost in time, money and manpower.

- **Comparable:** Data should be able to be compared to previous data in order to identify trends and changes.

6.1.3.3 EVALUATION DESIGN

A well-designed evaluation will document the reasons for success and assess where things may have gone wrong. The evaluation should:

- Identify who will be using the evaluation and for what purpose.

- Link the evaluation criteria to the program goal and objectives. For example, does the evaluation assess whether knowledge or attitudes were enhanced, or that new skills were learned.

- Ask enough questions to gather needed information but not be so long or detailed that the evaluator does not complete it.

- Consist of both qualitative and quantitative data. Qualitative data, i.e. open-ended responses, may be hard to quantify but usually contain more information. Objective ratings such as high, average, low or a list of descriptive adjectives such as practical, informative, confusing, etc. are easier to quantify while still containing qualitative information.

The evaluation design can be incorporated into a variety of program evaluation types. Quantitative data reports, review of client/participant files, focus groups, surveys (i.e., evaluation forms) and direct observation of programs are used most often to evaluate FFSC programs.

NOTE: Focus groups used for needs assessments are discussed in Section 3.1.2.1.2. Employing the same principles a focus group can also be utilized to evaluate PFM programs and services.

Ideally, a combination of evaluation methods should be used. For example, a questionnaire or survey can quickly collect a great deal of information from a large a number of people, where as a focus group can obtain more in-depth responses.

PFM programs should be evaluated on a regular basis but it is not necessary to evaluate a program every time it is presented. Evaluate a cross-section of programs, presenters, and commands to get a complete assessment.

The following methods can be used to evaluate programs. Sample forms are found in Appendix H.

- **Self-Evaluations:** A presenter self-evaluation solicits the presenter's thoughts on how he/she did, what went well and what did not, and what changes should be made. The presenter often has a different perspective than the participant or command.

- **Participant Evaluations:** Evaluates the impressions/understanding of the program by the participants. Input on the usefulness of the content and the effectiveness of the presenter, as well as suggestions for improvement are solicited. Participant evaluations should request basic demographic information such as whether they are a service member or spouse and how they heard about the program.

- **Command Evaluations:** Evaluates the command leadership/Point of Contact impression of the program. Feedback on the effectiveness of the presenter, content and suggestions for changes should be requested. After a presentation, the command often gives verbal feedback. This feedback may not be specific enough to be helpful and a written evaluation should therefore be obtained.

- **Observer Evaluations (FFSC staff):** FFSC supervisory staff can observe a program to evaluate the presenter's skills, the program content, or both. The observer can provide comparisons among this program/presenter and others.

When analyzing data from evaluations:

- Make copies and file the master copies. Keep the masters for reference.

- Tabulate the information in a meaningful way. If information can be ranked or rated, find the average. Or convey the range of answers, e.g. 20 people ranked this question "1".

- Organize comments into categories. For example, categories can include suggestions, concerns and strengths.

- Look for patterns. Did participants who were of similar rank have similar impressions or concerns? Perhaps, the program was more appropriate to a certain income level, etc.

- Translate the evaluation results into an action plan. What changes need to be made based on the input obtained?

- An evaluation review form can be used to summarize the content of participant and command evaluations. (See Appendix H, Attachment 8).

6.1.4 EVALUATION OF I&R SERVICES

Ensuring the quality of I&R services is a two-fold process. Examining and updating resources, and assessing client satisfaction are both significant components of I&R evaluation.

When reviewing resources:

- Ensure that resources are up-to-date. Periodically call agencies/organizations and obtain current information for the resource files. At a minimum, resources should be updated every six months.

- Establish if the information regularly needed by clients is included in the database. Are there categories of information that must be added to the database?

- Determine if the information is easily accessible. How is it organized? Can it be easily retrieved? Is it cross-referenced?

When evaluating client satisfaction:

- Determine if I&R services are meeting the clients' PFM needs. Are the services practical and timely?

- For walk-in clients, use an evaluation form. A sample Information and Referral Client Evaluation Form is found in Appendix H, Attachment 1.

6.1.5 EVALUATION OF COUNSELING SERVICES

Evaluating counseling services ensures quality and determines the effectiveness of the counseling process. There are several methods by which counseling can be evaluated. These include:

- Client evaluation of counselor (See Appendix H, Attachment 9)

- Supervisory observation of session (See Appendix H, Attachments 10 and 11)

- Counselor evaluation of process and outcome.

The financial counselor can evaluate the process of a session by considering:

- If he/she actively listened and identified themes.

- If he/she was sensitive to feelings and had the ability to react to them.

- If the client actively participated and came up with options and solutions.

- If the client took ownership of his/her problem.

- If the client prioritized options.

- If there were positive changes in the client's mood and demeanor during the session(s).

- If the client was willing to come back.

- If a couple, whether both reached consensus on the issues.

The counselor can evaluate outcome by:

- Asking the client if their financial situation has changed. Have they taken actions to resolve their own problems, i.e. made a budget, paid off bills or made arrangements with creditors. The client may say or imply that they no longer need help but can handle their problems on their own.

- Assessing whether the client met set goals. Using the FPW or other tools, compare the information from the first session to a later session. Does the client now owe less, use a budget, etc.

- Reviewing documentation including forms and case narrative. Although time-consuming, comprehensive information can be obtained. Examine and compare the results of several counseling cases.

When evaluating outcome, remember that the counselor cannot be responsible for the total elimination of financial problems that may have been ongoing for a long period of time. Using solution focused financial counseling techniques a case may be considered to have a positive outcome if the client reports even a small but significant change and is demonstrating progress in managing personal finances effectively.

6.1.6 EVALUATION OF CFS TRAINING

Participants in the CFS training course are asked to evaluate all segments of the course. Appendix H, Attachment 12 has a sample CFS Course evaluation form. For further information, see the CFS Course Instructor Guide.

6.2 RECORD KEEPING

Accurate and complete record keeping is necessary to successfully manage and ensure quality PFM programs and services. Clear documentation is needed regarding both qualitative and quantitative data (statistics). Policies and procedures, orientation and training, program format and content, counseling, and I&R services must be documented.

To ensure the accuracy of records:

- Devise a standardized method of keeping each type of record. Ensure that all staff consistently use this method.

- Keep original data sources such as evaluation forms.

- Date all reports.

6.2.1 STANDARD OPERATING PROCEDURES

Standard Operating Procedures (SOPs) are internal working documents that state how a program or service will be delivered. The SOP defines how tasks will be completed including the purpose, background, objectives, format, and quality assurance measures. Since proce-

dures are described and the format and content is available to all staff, SOPs ensure a minimum quality standard.

FFSC Accreditation Standard 42040 requires a standardized SOP format for all FFSC education and training programs. The SOP must include: title, date, references, outline, agenda, discussion questions, pertinent learning points, required equipment and materials, marketing materials and methods, and program evaluation. In addition to SOPS for training/education programs, SOPS are also necessary for counseling procedures, file organization, and other program management issues.

A sample SOP format for programs can be found in Appendix E, Attachment 6. A sample SOP for financial counseling functions is in Appendix F, Attachment 12.

6.2.2 COMPUTERIZED DATA COLLECTION SYSTEM

Each FFSC reports activities and services through a computerized data collection system. The system provides a full range of data gathering and collation for determining the demographics necessary for both programming and the budget process.

PFM programs and services are reported via the computerized data collection system. The number of counseling sessions, number of referrals, and both programs conducted at the FFSC and at command sites are included. Data required consists of the type of program (topic) as well as the number of participants (number of active duty broken down by rank and number of family members).

Financial counseling cases are reported in the PFM Master Client Record, non-clinical counseling category. If contact is less than 15 minutes and pertains to financial information and/or referral, it should be documented in the I&R portion of the Computerized Data Collection System Report. For further information on I&R record keeping see Section 6.2.4.3.

Data on CFS training must also be reported. OPNAVINST 1740.5A enclosure (4) e and f specify:

- The FFSC hosting CFS training (Mobile Training Team) must report the following to PERS-662 via the FFSC designated computerized data collection system report: the number of classes held, total number of CFSs trained by the MTT, number of clients and reason counseled.

- IF CFS training site, The FFSC must report to PERS-662 via the FFSC designated computerized data collection system report: the number of classes held, total number of CFSs trained and other data fields required by PERS-662C.

6.2.3 PROGRAM FILES

To successfully manage PFM programs and to ensure quality, it is necessary to keep accurate and complete records. Clear documentation of both qualitative and quantitative data is needed. Policies and procedures, program format and content, and orientation and training of staff, must be documented.

To ensure the accuracy of program records:

- Devise a standardized method of keeping PFM program records. Include the Program Request Form, Program Planning Checklist, Program Registration Form, Presenter/ Speaker Acknowledgment, program SOP and examples of all supporting materials such as handouts and marketing fliers. Samples of these can be found in Appendix E.

- Include the following information: Program title, staff position responsible for the program, date(s) of evaluations and dates Standard Operating Procedures were reviewed. It is important that it is signed and verified that the program was reviewed even if no changes were made (See Appendix H, Attachment 8).

6.2.3.1 CFS COURSE FILES

Whether the FFSC is a CFS training site or hosts a mobile training team (MTT), the FFSC must maintain CFS course record files. OPNAVINST 1740.5A, enclosure (4) f (3) requires that records be maintained for at least two years of the name, rate, SSN and source command of all trainees who successfully complete the CFS course. Documentation of this must be forwarded to the trainee's command for entry into that individual's service record via the Navy Integrated Training Resource Administration System (NITRAS).

In addition to the NITRAS data system information, the FFSC should keep a copy of the class roster and the program evaluations for each CFS training course. For further information on CFS training course records see the CFS Instructor Guide.

6.2.4 RESOURCE FILES

To have accurate and up-to date resources available for staff and client use, a database of information on community resources must be developed and maintained. Detailed data on agencies and services, and the conditions under which the services are available must be readily accessible.

NOTE: See Section 4.3.1.1 Development of Resources for criteria concerning inclusion of organizations in the resource database.

In addition to detailed information on community organizations, resource files should also contain free and low-cost materials for client use. Educational information on consumer-related topics is available from numerous organizations. Sources include popular magazines and consumer publications, materials from workshops and conferences, state and local consumer protection offices, the Consumer Information Center and cooperative extension services. Information pamphlets are also available through Navy Publications.

NOTE: See CFS manual for list of Resource File topics

6.2.4.1 ORGANIZATION OF RESOURCE FILES

When organizing PFM Resource files:

- Include information on eligibility requirements, fees, POC, telephone and mailing address, hours of operation, location, and description of services.

- Determine a format that is easy to use and maintain. The information must be quickly accessible. It can be computerized or hard copy. Information can be organized on a computerized database, a rolodex, file cards, or in folders.

- Use a standard classification system. This system should be coordinated with the FFSC's I&R resource file system.

- Organize files so that they are indexed and accessible in different ways, i.e. alphabetical by organization name, alphabetical by service headings, or by key words.

6.2.4.2 MAINTENANCE OF RESOURCE FILES

Once organized, resource files must be maintained on a regular basis. To facilitate the maintenance of resource files:

- Stamp all materials with the date received.

- Update resources on a regular schedule. Plan to do this on at least a semi-annual basis.

- Maintain relationships with agencies/providers so that updated materials and information can be obtained.

- Discard or replace all dated materials at least semi-annually.

6.2.4.3 I&R RECORD KEEPING

Each I&R encounter should be recorded on an I&R Tally Sheet as a "work count". A work count is a result of a telephone inquiry, written request, walk-in, or Internet contact in which the individual gets information or obtains a referral. I&R work counts usually involve requests for information that can be satisfied within 15 minutes. However, a telephone inquiry can take more than 15 minutes to resolve. Since there is no way to sign a Privacy Act statement, this inquiry is considered an I&R encounter (unless an appointment is scheduled).

An I&R work count measures services provided not the number of personnel served. A single client who gets information in two categories would be two work counts. A sample I&R work count sheet is found in Appendix D, Attachment 3.

6.2.5 COUNSELING CASE FILES

The purpose of a PFM counseling case file is to establish a clearly defined system of recording financial counseling services from initial contact through case closure. A client's PFM counseling case file is retained under the name and case number of the client being served. Each FFSC has a method by which they number case records. The numbering system should be systematic and sequential (from start of fiscal or calendar year) for easy retrieval. Please note that the service member's social security number may not be used to identify the case record.

6.2.5.1 CONTENT OF COUNSELING FILES

Financial counseling case record files must contain the following information:

- A signed and witnessed Privacy Act statement

- Completed client information form/intake sheet

- Financial Planning Worksheet

- Case activity notes

There is not a prescribed method by which case records must be organized. It is recommended that the records be arranged in a manila-style file folder. All case materials should be bound inside the folder to ensure records remain intact and professional.

The following is a suggested method of organizing a case file. Each center may differ in what they include (beyond the required paperwork) and how the case material is organized. However, within each FFSC the financial counseling records should all follow the same format and order.

Each case record should include on the left side of the folder from the bottom up:

1. Disclosure of Information Form

2. Authorization to Release Information

3. A signed and witnessed Privacy Act statement

4. Financial Planning Worksheet

5. Other financial information such as LES, Power Pay Plan

6. Completed client information form/intake sheet

Each case record should include on the right side of the folder from the bottom up:

1. Correspondence, in chronological order with the most recent on top

2. Case activity notes

   - There should be a case activity note entry for every client or client-related contact (telephone calls, comments to referrals, etc.)

   - Notes should be completed promptly (within 48 hours if possible).

   - Notes should be factual and objective. Include significant points or observations and actions taken.

   - Each entry should be legible (via computer), dated and signed.

- It is possible that a case record could be read by other individuals (i.e. court review). Information must be sufficiently clear so that others can read and understand the case.

- The case activity notes serve as a record of contacts. In addition, some FFSCs may use a one page record of contacts listing dates and types of contact.

3. Closing summary when appropriate

- Should include summary of services, outcome, and prognosis.

- Should be signed and dated by the financial counselor.

For quick access to client information a cover sheet may be attached to the inside of the case record file. Data on this cover sheet could include client name(s) and social security number(s), command, work and home phones, and referral source.

6.2.5.2 MAINTENANCE OF COUNSELING FILES

Each FFSC should have a central case record system for PFM non-clinical counseling cases. A master case log should be maintained where all cases are logged in. When the case is closed it should be noted in the master case log.

Only authorized FFSC staff may have access to case records. Case materials are confidential information and must be kept secure. Any materials with identifying information should be cleared from desktops and routing boxes and kept locked in a file cabinet. Hard copy of case records should be purged two years after closing. Electronic records are destroyed after five years.